

1 LESLIE MARK STOVALL, ESQ.
Nevada Bar No. 2566
2 ROSS MOYNIHAN, ESQ.
Nevada Bar No. 11848
3 STOVALL & ASSOCIATES
4 2301 Palomino Lane
Las Vegas, NV 89107
5 Telephone: (702) 258-3034
6 E-service: court@lesstovall.com
Attorney for Plaintiff
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8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 RANDOLPH DAVILA, individually)
11) CASE NO.: 2:18-cv-02235-JAD-VCF
Plaintiff,)
12 vs.)
13 DEREK WOLFE, individually, DOES I-X)
14 and ROE CORPORATIONS I-X inclusive,)
15 Defendants.)

16 **PLAINTIFF'S UNOPPOSED MOTION TO EXTEND THE TIME FOR PLAINTIFF**
17 **TO FILE A RESPONSE TO DEFENDANT'S MOTION FOR PROTECTIVE**
18 **ORDER FORBIDDING DISCLOSURE (FIRST REQUEST)**

19 COMES NOW Plaintiff, by and through his attorneys, STOVALL & ASSOCIATES, and
20 files this Motion to extend the time for plaintiff to file a response to defendant's motion for
21 protective order forbidding disclosure (ECF NO. 92). This is the first request for an extension of
22 time to oppose this motion. Defendant's motion was filed on September 21, 2020. Plaintiff's
23 response is due on October 5, 2020. Through this motion, plaintiff requests an extension to
24 October 19, 2020 to file the response. Defendant does not oppose the extension of time.
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1 This motion is based upon the pleadings and papers on file herein, the Memorandum of
2 Points and Authorities attached hereto, and any oral argument this Court may entertain at the
3 hearing of this Motion.

4 Dated this 5th day of October 2020.

STOVALL & ASSOCIATES

/s/ Ross Moynihan

ROSS H. MOYNIHAN, ESQ.
Nevada Bar No. 11848
2301 Palomino Lane
Las Vegas, Nevada 89107
Attorney for Plaintiff

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15 **DECLARATION OF PLAINTIFF'S COUNSEL IN SUPPORT OF MOTION**

16 ROSS MOYNIHAN, declares and states as follows:

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18 1. I am an attorney at the Law Office of Stovall & Associates, counsel for Plaintiff,
19 and am licensed to practice law in the State of Nevada.

20 2. On September 21, 2020, Defendant filed a MOTION for Protective Order
21 Forbidding Disclosure of Privileged Information. ECF NO. 92.

22 3. Plaintiff's response to the motion is due on October 5, 2020.

23 4. I require additional time to complete and file the opposition due to workload
24 issues.

25 5. On October 5, 2020 I sent an email to defendant's counsel requesting an extension
26 of 14 days to file the opposition.
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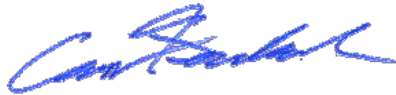
1 Based upon the declaration of counsel, plaintiff submits that good cause exists for the
2 extension of plaintiff's time by 14 days from October 5, 2020 to October 19, 2020 to file his
3 response to defendant's motion for protective order forbidding disclosure.
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5 Dated this 5th day of October 2020.

6 STOVALL & ASSOCIATES

7 /s/ Ross Moynihan
8 ROSS H. MOYNIHAN, ESQ.
9 Nevada Bar No. 11848
10 2301 Palomino Lane
11 Las Vegas, Nevada 89107
12 *Attorney for Plaintiffs*

13 IT IS SO ORDERED.

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15 _____
16 Cam Ferenbach
17 United States Magistrate Judge

18 Dated: 10-6-2020
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 5th day of October 2020, service of the foregoing PLAINTIFF'S MOTION TO EXTEND THE TIME FOR PLAINTIFF TO FILE A RESPONSE TO DEFENDANT'S MOTION FOR PROTECTIVE ORDER FORBIDDING DISCLOSURE was made this date through the court's electronic filing system to the following:

Richard A. Schnofeld, Esq.
CHESNOFF & SCHONFELD
520 South Fourth Street
Las Vegas, NV 89101
Email: rschonfeld@cslawoffice.net
Attorneys for Defendant

Matthew R. Giacomini, Esq.
Springer and Steinberg, P.C.
1600 Broadway Suite 1200
Denver, CO 80202
Email: mgiacomini@springersteinberg.com
Attorneys for Defendant

/s/ Ross Moynihan
An employee of STOVALL & ASSOCIATES